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March 24, 2021

BY ECF

The Honorable Analisa Torres  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Daniel L. Stein**

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Re: *United States v. Brian Kolfage, et al.*,  
20 Cr.412 (AT)

Dear Judge Torres:

As you know, we represent Andrew Badolato in the above-captioned matter. Mr. Badolato has been released, subject to conditions, including a condition restricting his travel to the Middle District of Florida, the Southern District of New York, the District of Columbia, and all points in between for the purpose of traveling to meet with counsel.

Mr. Badolato wishes to travel by automobile to Nashville, Tennessee, which is in the Middle District of Tennessee, to attend a series of business meetings. Mr. Badolato plans to leave for these meetings on or about March 29 and return to his residence in the Middle District of Florida no later than April 6, 2021. Mr. Badolato has advised his supervising Pretrial Services Officer in Florida, Jim Haskett, of his travel plans and will make periodic reports on the progress of his travel. Pretrial Services has advised that it has no objections to this travel. We have also advised government counsel of this planned trip, and AUSA Nicolas Roos has advised that the Government has no objection to this travel.

Accordingly, we respectfully request that the Court modify Mr. Badolato's pretrial release conditions for the limited purpose of allowing travel to the Middle District of Tennessee between March 29, 2021, and April 6, 2021, as described above.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Daniel L. Stein".

Daniel L. Stein  
Partner

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cc: All Counsel of Record  
Jim Haskett  
U.S. Pretrial Services Officer (via email)